UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

AMRO FARID,

Plaintiff,

v.

CIVIL ACTION NO. 1:23-cv-00426-SM

TRUSTEES OF DARTMOUTH COLLEGE,

Defendant.

PLAINTIFF'S SUPPLEMENTAL INITIAL DISCLOSURES

Plaintiff Amro Farid provides the following supplemental information to the initial disclosures provided to Defendant Trustees of Dartmouth College ("Dartmouth") on January 20, 2024 pursuant to Fed. R. Civ. P. 26. Plaintiff reserves the right to supplement these disclosures further as necessary as more information becomes available.

- 1. Individuals likely to have discoverable information relevant to the Plaintiffs' allegations and subjects of that information¹
 - Amro Farid, Plaintiff: Information relevant to Plaintiff's allegations and emotional distress: contacted through Plaintiff's counsel
 - Inas Khayal, Professor at Dartmouth and spouse of Plaintiff: all information relevant to Plaintiff's allegations and emotional distress: contacted through Plaintiff's counsel
 - Joseph Helble: information from Plaintiff's interview with Defendant, information on discrimination claim and related allegations
 - Alexis Abraham: information on Plaintiff's tenure application, review, appeal, and his related discrimination and retaliation claims,

¹ As all individuals listed are employees of Defendant except as otherwise noted, Defendant already has their full contact information and Plaintiff does not have it except where indicated.

- Vikrant Vaze: information about his personal tenure application process
- Laura Ray: information on tenure application, review, appeal, discrimination and retaliation claims
- Holly Wilkinson: information on research misconduct investigation and Plaintiff's relationship with doctoral students
- Charles Sullivan: information on Plaintiff's relationship with doctoral students and tenure denial
- Petra Bonfert-Taylor: Information on Plaintiff's teaching and tenure process and
 Thayer leadership
- Erland Schulson: Information on Thayer leadership team and undergraduate academics courses by Plaintiff and tenure process
- Lee Lynd: Information on Plaintiff's mentorship
- Scott Pauls: Information on teaching evaluations
- Jason Stauth: Information on Plaintiff's academic courses
- Eugene Santos: Information on tenure review professor
- John Zhang: Information on Plaintiff's academic courses
- Miles Blencowe: Information on Procedural appeal for Plaintiff's tenure review
- Patricia Anderson: Information on Procedural appeal for Plaintiff's tenure review
- Irene Kacandes: Information on Procedural appeal for Plaintiff's tenure review
- David Kotz: Information on the retaliation claims
- Dean Madden: Information on the retaliation claims

- Wester Schoonenberg: Information on Plaintiff's research labs and Prabat Hegde;
 contact information unknown except for email address:
 wester.schoonenberg@gmail.com
- Prabat Hegde: Information on Plaintiff's research labs and the research misconduct allegation; contact information unknown.
- Steffi Muhanji: Information on Plaintiff's research labs and Prabat Hegde, contact information unknown except for email: stmuhanji@gmail.com
- Kristi Clemens: Information on the research misconduct investigation, tenure denial appeal and discrimination claim
- Elizabeth Wilson: Information on CRELL funding and retaliation claims
- Jodi Harrington: Information on financial information tied to research at Thayer,
 tenure denial, retaliation, and research misconduct investigation
- Dakota Thompson: Information on Plaintiff's research labs and Prabat Hegde, contact information unknown except for email: thompson2.718@gmail.com
- Stephen Doig: Information on CRELL funding and retaliation claim
- April Salas: Information on CRELL funding and retaliation claim
- Clifton Below: Information on CRELL funding
- Frances Haas, Esq.: Information on the internal discrimination investigation
- Ulrike Wegst: Information on internal transfer of grant money
- Jifeng Liu: Information on internal transfer of grant money
- Jeanne Shaheen, United States Senator: CRELL funding
- Caitlin Callaghan: CRELL funding, U.S. Army Corps of Engineers, Engineer Research & Development Center, Cold Regions Research & Engineering Lab, ATTN: CEERD-PA-H, 72 Lyme Road, Hanover, NH 03755-1290

- Francis Magilligan: Information on the research misconduct investigation
- Peter Mucha: Information on the research misconduct investigation
- Chandrasekhar Ramanathan: Information on the research misconduct investigation
- Henrike Frowein: Information on the research misconduct investigation
- Valerie J. Hillgren: Information on the research misconduct investigation, Office of the Inspector General, National Science Foundation, 2415 Eisenhower Ave, Suite, W16100, Alexandria, VA 22314, Office: 703-292-8456, Fax: 703-292-9159
- Paul B. Harwell: Information on the research misconduct investigation
- Linda M. Sullivan: Information on the research misconduct investigation
- Nicole H. Hewett: Information on the research misconduct investigation, CRELL
- Prasad Jayanthi: Information on research misconduct investigation
- Andrew Campbell: Information on research misconduct investigation
- Kenneth A. Loparo: Information on research misconduct investigation
- Stephanie Garcia: Information on financial information at CRELL funding
- Jared Oren: Information on CRELL funding
- Ian Baker: Information on Thayer leadership, Prabat Hegde, tenure denial, research misconduct investigation
- Kristin Miller: Information on CRELL funding
- Martin Jeffries: Information on CRELL funding
- Weiyang (Fiona) Li: Information on internal transfer of grant money
- Sarah Brooks: Information on Office of Sponsored Projects at Thayer and related financial information
- Tricia Spellman: Information on finances at Thayer and effect on Plaintiff

- Cara Stephens: Assistant to Alexis Abraham and Information on her role with Plaintiff
- Samuel Golding: Information on Conflict of interest between Salas and CRELL funding
- Elizabeth Smith: Information on Tenure appeal and procedural error
- Members of the Committee Advisory to President in 2021 (not listed because may have changed from current panel): Information on tenure denial
- Members of the Tenure Appeal Process (Discrimination) (unknown): Information on information on tenure denial
- Phil Hanlon: Information on denial of tenure
- Richard Mills: Information on discrimination claim and failure to use Plaintiff's expertise in college's energy system design
- Lisa Hogarty: Information on discrimination claim and failure to use Plaintiff's expertise in college's energy system design
- Abbe Bjorklund: Information on discrimination claim and failure to use Plaintiff's expertise in college's energy system design
- Douglas Van Citters: Information on Thayer leadership, tenure denial and retaliation.
- Eric Fossum: Information on Thayer leadership, tenure denial and retaliation.
- Geoffrey Parker: Information on Theyer leadership, tenure denial and retaliation.
- John Stark: Information on discrimination claim and failure to use Plaintiff's expertise in college's energy system design

- NSF individuals involved in research misconduct investigation, including but not limited to Valerie Hilgren: information on research misconduct investigation (see contact information above)
- Mark Laser: Information on student advisees
- Stephen Taylor: Information on student advisees
- Klaus Keller: Information on Prabat Hegde
- Rosalie (Rosie) Kerr: Information on discrimination claim and failure to use
 Plaintiff's expertise in college's energy system design
- Stephen Shadford: Information on discrimination claim and failure to use Plaintiff's expertise in college's energy system design
- Frank Roberts: Information on discrimination claim and failure to use Plaintiff's expertise in college's energy system design
- Former Dartmouth Muslim Chaplains: information on discrimination claim and climate for Muslim employees
 - o Sharif Rosen, Dawood Yasin, Khalil Abdullah, Dr. Jibran Khokar
- Rabbi Daveen Litwin: Information on discrimination and climate for minority professors
- Anne R. Kapuscinski: Information on Plaintiff's interview with Dartmouth
- Erin Mansur: Information on Plaintiff's interview with Dartmouth
- Jill Mortali: Information on Office of Sponsored Program, CRELL funding, research money transfer practice
- Renee Brown: Information on Office of Sponsored Program
- Aaron Clough: Information on Office of Sponsored Program

• Reza Olfati-Saber: Information as a similarly-situated professor in tenure

2. Description by category and location of all documents relevant to dispute

The majority of documents relevant to this dispute are in the possession or control of Defendants, including Plaintiff's employment records, research misconduct investigation records, tenure appeal records, and documents related to similarly-situated professors granted tenure.

Plaintiff possesses his tenure dossier and research records in electronic form, as well as emails and other electronic communications related to his employment with Dartmouth, tenure appeal, and research misconduct investigation. Plaintiff also possesses damages documents in electronic form.

3. Calculation of Damages

Plaintiff's damages include compensatory damages, lost income, emotional distress, reputational harm, future anticipated business and economic losses, and recovery of his attorneys' fees and costs. Plaintiff's emotional distress damages will be valued by a jury.

Plaintiff's damages cannot be calculated at this time because they depend on information in the custody and control of Defendants and are ongoing and continue to accrue.

Plaintiff last salary at Dartmouth was \$140,425.04 for the 2021-2022 academic, which was paid over a nine-month period. Plaintiff can make documents evidencing this salary available to Defendant's inspection. He alleges an unknown lost salary due to the salary increase received with tenure and possible related promotion. The amount of such salary increase was never disclosed to him and documents and information evidencing such loss are in the custody and control of Defendants.

Plaintiff earns a higher salary in his current employment than he earned in his final year of employment at Dartmouth. Plaintiff does not have any quantifiable business losses at this time but anticipates future losses as a result of the reputational damage caused by Defendant's actions.

Plaintiff lost research grants that, but for the retaliation of Defendant, would have been transferred to Stevenson. The value of the research grants is \$873,146, and he would have earned 3.5 months in salary from the combined grants.

Plaintiff also seeks punitive damages (on federal claims) and enhanced compensatory damages (on state law claims), to be valued by a jury, and statutory interest at the maximum permissible rate.

Plaintiff reserves the right to supplement any of the foregoing information as necessary and as more information becomes available.

4. Insurance Agreements

Not applicable.

Respectfully submitted,

PLAINTIFF AMRO FARID,

By his attorneys,

Date: January 25, 2024 By: /s/Mark M. Whitney

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and

By: /s/ Joseph L. Sulman

Joseph L. Sulman, MA BBO #663635 (pro hac vice admission pending)

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CERTIFICATE OF SERVICE

I hereby certify that I served this document on counsel for Defendants by electronic mail on January 25, 2024.

/s/ Mark M. Whitney

Mark M. Whitney (NH Bar No. 11892)